



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAY 21 2014

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7677 7681
RETURN RECEIPT REQUESTED

Mr. Terry A. Farr
Environmental, Health, and Safety Coordinator
Federal-Mogul Corporation
Powertrain (Rings and Liners)
2318 Waldo Boulevard
Manitowoc, Wisconsin 54220

Re: Notice of Violation
RCRA Compliance Evaluation Inspection
Federal Mogul Piston Ring, Inc., Manitowoc, Wisconsin
WID 980 570 550

Dear Mr. Farr:

On December 11, 2013, representatives of the U.S. Environmental Protection Agency and Wisconsin Department of Natural Resources (WDNR) inspected the Federal Mogul Piston Ring, Inc. ("Federal Mogul") facility, located at 2318 Waldo Boulevard, Manitowoc, Wisconsin. The purpose of the inspection was to evaluate Federal Mogul's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation of hazardous waste, universal waste, and used oil. We have enclosed a copy of the inspection report for your reference. EPA acknowledges receiving e-mails from you on December 20, 2013 and May 2, 2014.

Based on information provided by Federal Mogul personnel, a review of records, and personal observations by the inspectors, EPA finds that Federal Mogul violated certain requirements of the Wisconsin Administrative Code (WAC) and the United States Code of Federal Regulations (CFR). We find that Federal Mogul was not in compliance with the following hazardous waste requirements:

1. In order to avoid the need for a hazardous waste storage license, a large quantity generator must meet certain conditions. See, WAC § NR 662.034(1)(a) through (d). The generator must comply with the requirements of Subchapters C and D of WAC NR 665, WAC § NR 665.0016 and NR 668.07(1)(e). See, WAC § NR 662.034(1)(d). Specifically, the owner or operator must have a contingency plan for the facility. See, WAC § NR

665.0051(1) [40 CFR 265.51]. The plan must also include a list and location and physical description of emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external) and decontamination equipment), where this equipment is required. See, WAC § NR 665.0052(5) [40 CFR § 265.52(e)].

During the records review portion of the inspection, Federal Mogul personnel provided the inspectors with a Contingency Plan dated December 2011. The plan did not include a list and location and physical description of emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external) and decontamination equipment). Federal Mogul therefore, failed to comply with WAC § NR 665.0052(5) [40 CFR § 265.52(e)].

2. In order to avoid the need for a hazardous waste storage license, a large quantity generator must meet certain conditions. See, WAC § NR 662.034(1)(a) through (d). In addition, a generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in WAC § NR 661.33(5) in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste without complying with sub. (1) provided the generator complies with WAC §§ NR 665.0171, 665.0172, and 665.0173(1) and marks the containers with the words "Hazardous Waste" or with other words that identify the contents of the containers. See, WAC § NR 662.034(3)(1) and (2) [40 CFR 262.34(c)(1)(i) and (ii)].

During the inspection of the CR1 Plating Shop, the inspectors observed four 55-gallon containers (Chrome Debris, Chrome Solids/PPE, Sander Sludge, and Chrome Liquid Wash) which were identified by Federal Mogul personnel as hazardous waste satellite accumulation area (SAA) containers, see photograph number 19. This area appeared to be a central accumulation area for wastes from the Plating Shop and not under the control of an operator generating the waste nor at the point of generation. Federal Mogul, therefore, failed to comply with the above-mentioned condition for a storage permit exemption. Federal Mogul should relocate the 55-gallon SAA containers closer to each waste generation area or designate this area as a hazardous waste less than 90-day container accumulation area.

3. Used oil generators are subject to all applicable Spill Prevention Control and Countermeasures requirements at 40 CFR Part 112 in addition to the requirements of WAC Chapter 679 Subchapter C and 40 CFR Part 279, Subpart C. Containers and aboveground storage tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil." See, WAC § NR 679.22(3) [40 C.F.R. § 279.22(c)(1)].

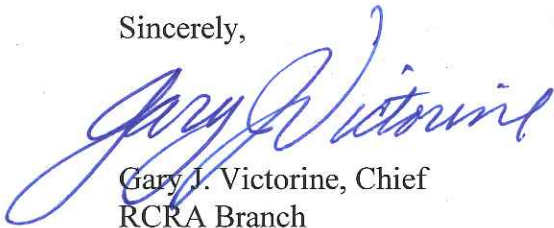
During the inspection, the inspectors observed containers labeled "Waste Oil", see photographs number 3 and 6. In addition, the inspectors observed an unlabeled tote in the

West Ground Level Accumulation Area which was not labeled "Used Oil", see photograph number 17. At the time of the inspection, Federal Mogul failed to comply with the used oil generator labeling requirements as required by WAC § NR 679.22(3) [40 C.F.R. § 279.22(c)(1)].

At this time, EPA is not requiring Federal Mogul to apply for a storage license so long as Federal Mogul immediately establishes compliance with the conditions for an exemption outlined above. Under Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928, EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that OEM Fabricators submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

If you have any questions regarding this letter, please contact Walt Francis, of my staff, at (312) 353-4921.

Sincerely,



Gary J. Victorine, Chief
RCRA Branch

Enclosures

cc: Barti Oumarou, WDNR-Oshkosh Service Center
(barti.oumarou@wisconsin.gov)
Mike Ellenbecker, WDNR-Sturtevant Service Center
(michael.ellenbecker@wisconsin.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME: FEDERAL MOGUL PISTON RING, INC.

FACILITY U.S. EPA ID NO.: WID 980 570 550

FACILITY TYPE: Large Quantity Generator

FACILITY ADDRESS: 2318 Waldo Boulevard
Manitowoc, Wisconsin 54221

U.S. EPA REPRESENTATIVE: Walt Francis

DATE OF INSPECTION: December 11, 2013

SIC CODE: 3592 – Carburetors, Pistons, Piston Rings, and Valves

NAICS CODE: 33631 – Motor Vehicle Gasoline Engines and Engine Parts
Manufacturing

336311 – Carburetor, Piston, Piston Ring, and Valve
Manufacturing

PREPARED BY: Walt Francis
Walt Francis
Environmental Scientist

12/23/2013
Date

ACCEPTED BY: Julie Morris
Julie Morris, Chief
Compliance Section 2
RCRA Branch

12/23/13
Date

Purpose of Inspection

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) at Federal Mogul Piston Ring, Inc. (Federal Mogul) located at 2318 Waldo Boulevard, Manitowoc, Wisconsin to determine compliance with the Resource Conservation and Recovery Act (RCRA) and the Wisconsin Administrative Code (WAC), with respect to Federal Mogul's management of hazardous waste, universal waste and used oil.

Participants

United States Environmental Protection Agency (U.S. EPA) Inspector -
Walt Francis, Environmental Scientist

Wisconsin Department of Natural Resources (WDNR) Inspector –
Barti Oumarou, Waste and Materials Management Specialist

Representatives of Federal Mogul -
Terry Farr, Environmental Health and Safety Coordinator
Rick LaPean, Manufacturing Support Technician
David Ourada, Production Manager Plant 2
Kevin Rick, Technical Service Manager

Site Description/Background Information

The Federal Mogul Piston Ring, Inc. facility is located at 2318 Waldo Boulevard, Manitowoc, Wisconsin and specializes in the manufacturing and chrome plating the outside diameter of piston rings for gasoline and diesel engines. Piston rings are made from either cast iron or steel wire. Cast iron rings are manufactured at a Federal Mogul facility in Sparta, Michigan and shipped to the Manitowoc, Wisconsin facility. Piston rings are ground to size width wise to certain shapes (outside diameter and inside diameter). The Manitowoc facility has several chrome plating lines: Cr1; Cr4; CKS (ceramic); and PVD (Physical Vapor Deposition) and is distinguished as Plant 1 or Plant 3. In addition, some piston rings are treated with molybdenum and some piston rings undergo a "blackening" step. Federal Mogul operates a facility (Plant 2) across the street and down the road called United Piston Ring, Inc. (UPR). UPR is a joint venture by Federal Mogul and Teikoku Piston Ring Co., Ltd. to manufacture automotive piston rings. The Federal Mogul facility generates: "Blackening Slurry" waste sodium hydroxide (D002) from Plants 2 and 3 from the cleaning out of baths approximately one to two 55-gallon containers per month; Chrome Debris (D007) from the cleaning out of chromium plating tanks in Plant 1 or Plant 3 and placed in a lugger box outside; Chrome Sander Sludge (D007) from Plant 1 or Plant 3; Waste Chrome Liquid (D002/D007) from spent plating solutions from Plant 1 or Plant 3; Chrome Slip Slurry (D007) Chrome Plating Department waste from removing chrome plating from tooling; Air Scrubber Filter (D007) from Plant 1 and Plant 3 air scrubbers; Chrome Slurry (D002/D007) solids from tank cleanout Plant 1 and Plant 3; Wastewater treatment sludge

(F006/D007) from two EcoTech units located in Plant 1; Ultrasonic Waste Solution (D007) Plant 1 and Plant 3; aqueous parts washers serviced by Safety-Kleen; used oil (used oil, mineral oil, hydraulic oil, and some machining coolants) picked up by Safety-Kleen; and universal waste lamps and batteries are picked up by Safety-Kleen. Used rags are sent off-site and laundered by Cintas, Greenville, Wisconsin. In addition, Plant 2 utilizes "Isopar C Solvent" in the cleaning process of piston rings. Muskegon Piston Ring Company originally submitted an EPA Form 8700-12 on 8/13/1980. The Goetze Corporation of America submitted an EPA Form 8700-12 on 7/20/1993 for the Manitowoc facility. The Manitowoc facility (Plants 1, 2, and 3) currently has approximately 722 employees and operates seven days per week. In addition, Federal Mogul transferred some production activities from a facility in Wausau, Wisconsin to the Manitowoc facility.

At the time of the inspection, the Federal Mogul facility was operating as a Large Quantity Generator (LQG) of hazardous waste. Historical hazardous waste streams based on the 2011 Biennial Report included off-site shipments of: Chrome Liquid (D002/D004/D006/D007/D008); Chrome Strip Slurry (D007); Chrome Debris (D007); Wastewater Treatment Filter Cake (F006); Blackening Slurry (D002); Chrome Slurry Solids (D002); and Chrome Sander Sludge (D007). At the time of the inspection, the last off-site shipment of hazardous waste was on December 3, 2013. Other wastes include: 1) used oil; 2) used fluorescent lamps; 3) used shop towels; and 4) used aqueous parts washer solution. WDNR provided U.S. EPA with a copy of a November 25, 2013, "Hazardous Waste Manifest Records For Selected Generator" report for the period December 11, 2010 through December 11, 2013 for out-bound shipments of hazardous waste from the Manitowoc, Wisconsin facility. The WDNR out-bound manifest report indicated that hazardous waste D007 and D002/D007/D008 and D002/D007 was shipped to Veolia ES Technical Solutions, Menomonee Falls, Wisconsin (WID003967148), D007 was shipped to Michigan Disposal, Belleville, Michigan (MID000724831); D002/D006/D008/D004/D007 was shipped to Enviroline of Illinois, Inc. DBA EQ Illinois, Harvey, Illinois (ILD000666206); and D002/D006/D008/D004/D007 was shipped to Inmetco, Ellwood City, Pennsylvania (PAD087561015). For the period October 1, 2012 through October 7, 2013, Federal Mogul made 37 shipments ranging from 459 pounds to 288,062 pounds of hazardous waste.

Opening Conference

U.S. EPA representative Walt Francis arrived at the Federal Mogul facility at approximately 8:30 a.m. Inspector Francis introduced himself to Mr. Terry Farr, Environmental Health and Safety Coordinator. Mr. Farr took the inspector to his office. Inspector Francis presented his credentials to Mr. Farr, and informed him of the nature, scope, and procedures of the inspection. Inspector Barti Oumarou from WDNR arrived at Mr. Farr's office a short time later. The inspection was conducted by U.S. EPA and WDNR. Mr. Farr introduced Mr. Kevin Rick, Technical Services Manager. Mr. Farr provided the inspectors with a brief overview of the main facility, and provided information on the UPR facility. Mr. Farr explained the various hazardous wastes generated at the Manitowoc facility. Inspector Francis asked Mr. Farr about used oil and universal waste. Mr. Farr explained to the inspectors that used oil was picked up by Safety-Kleen

Systems, Kimberly, Wisconsin (WID988579439) and universal waste lamps were picked up by Safety-Kleen Systems, Kaukauna, Wisconsin (WID981187297). Inspector Francis reviewed several out-bound hazardous waste manifests records, and discussed the operation of the facility.

Inspector Francis noted that the outbound tracking report indicated the last off-site shipment of D007 (chromium waste) was on October 7, 2013. Federal Mogul did not make a CBI claim on the information gathered during the inspection. Mr. Farr allowed the inspectors access to the facility to conduct the inspection.

Site Tour

The walk-through began at the UPR, Plant 2 facility. Mr. Farr introduced Mr. Dave Ourada. Mr. Ourada showed the inspectors a 55-gallon satellite accumulation area (SAA) container in the Ferroxide Area. Inspector Francis observed a 55-gallon SAA container of Blackening Sludge, see photograph number 1. The walk-through continued to a degreasing unit. Mr. Ourada showed the inspectors how metal parts are degreased in a machine with a reservoir filled with "Isopar C Solvent". Mr. Ourada showed the inspectors how the used solvent is piped to a distillation apparatus. Mr. Ourada showed the inspectors a 55-gallon container of "Lapping Slurry" and a 5-gallon container labeled "Waste Oil", see photographs 2 and 3. Mr. Ourada told the inspectors that the distillation apparatus generates used oil and waste filters. Mr. Ourada told the inspectors that the distillation unit waste filters are placed in the general trash. The walk-through continued to the used fluorescent lamp accumulation area. Mr. Ourada showed the inspectors several boxes of used fluorescent lamps. The walk through continued to an area where 55-gallon containers of used blast media, used oil lapping sludge and Oberlin machining swarf were accumulated, see photographs 4 and 5. Inspector Oumarou asked Mr. Ourada about the used oil containers. Mr. Ourada told the inspectors that used oil is removed from the upper layer of the drum and the lower lapping sludge layer is placed in the general trash. The walk-through continued to the PVD area. Mr. Ourada showed the inspectors a PVD machine and explained how parts are coated with chrome. The walk through continued to the wastewater treatment area. Mr. Ourada explained how wastewater is treated with sulfuric acid and caustic soda and then discharged to the Manitowoc city sewer. Inspector Francis observed a 5-gallon container labeled "Waste Oil", see photograph number 6. The inspection group left the UPR facility and went back to the main Federal Mogul facility. Mr. Farr showed the inspectors several outside lugger boxes utilized for accumulation of F006 wastewater treatment sludge and a roll off box of D007 chromium debris, see photographs 7, 8, 10, 11, and 12. The inspection continued to the less than 90 day hazardous waste accumulation area. Mr. LaPean showed the inspectors Accumulation Room #1. Mr. LaPean told the inspectors that Accumulation Room #1 was utilized for non-hazardous molybdenum chips and debris, Blackening Slurry, Stripper Slurry, and Ultrasonic Slurry. Inspector Francis observed a 55-gallon container of Stripper Slurry dated 11/6/2013, a 55-gallon container of Blackening Slurry dated 11/15/2013, a 55-gallon container of Stripper Slurry dated 11/22/2013, another 55-gallon container of Stripper Slurry dated 10/20/2013, and a 55-gallon container of Ultrasonic Degreaser dated 12/5/2013 (see photograph numbers 13 and 14). Mr. LaPean showed the inspectors a Spill Kit in an area outside of Accumulation Rooms 1, 2, and 3. Mr. LaPean showed the inspectors Accumulation Room #3. Mr. LaPean explained that Waste

Chrome Liquid is accumulated in 55-gallon containers in Accumulation Room #3, and removed off-site via tanker truck. The inspectors observed approximately forty-seven 55-gallon containers of chromic acid bath waste in Accumulation Room #3. Inspector Francis observed accumulation dates of "12/11/2013", "11/1/2013", "9/29/2013", and "9/21/2013" (see photograph numbers 15 and 16). Inspector Oumarou asked Mr. LaPean about the epoxy floor coating. Inspector Francis asked Mr. LaPean who brings the 55-gallon containers to the hazardous waste accumulation area. Mr. LaPean told the inspectors that Federal Mogul support staff bring the waste containers to the hazardous waste accumulation area. The inspection continued to Accumulation Room #2. Mr. LaPean showed the inspectors eight 55-gallon containers of "Ecotech Sludge" dated 10/17/2013 and a number of containers of chrome product material from Atotech. Mr. Farr told the inspectors that Veolia had sampled the Ecotech sludge containers and they were waiting for the results. The walk-through continued to the West Ground Level Accumulation Area. Mr. LaPean showed the inspectors two 275-gallon totes of used oil. Inspector Francis noted that one tote was labeled "Used Oil" and the other tote was not labeled, see photograph number 17. The walk-through continued to the "Compressor Room". Mr. Farr showed the inspectors a 55-gallon container labeled "Used Oil". The walk-through continued to the Store Room. Mr. Farr showed the inspectors a universal waste accumulation area. Inspector Francis observed three boxes of used 4' fluorescent lamps and a container for used batteries. The walk-through continued to the Plating Shop. Mr. Farr showed the inspectors an "accumulation area" near CR1. Inspector Francis observed four 55-gallon containers labeled "Chrome Debris Filters/Chrome Tape", "Chrome Solids/PPE", "Sander Sludge", and "Chrome Liquid Waste/Mop", see photograph number 19. Mr. Farr explained that hazardous waste is brought from other plating lines to this area for consolidation. The walk-through continued to the CR1 Plating Line wastewater treatment filter press. Mr. Farr showed the inspectors a lugger box with F006 sludge, see photograph number 18. Mr. Farr told the inspectors that it takes approximately 6 weeks to fill the lugger box. The walk-through continued to the Blitz Chrome, CKS Chrome, and CR4 Chrome areas. Mr. Farr showed the inspectors the CR4 Chrome wastewater treatment lugger box, see photograph number 20. The walk-through continued to the arbor sanding area. Mr. Farr showed the inspectors how sanding slurry is generated. The walk-through continued to the PVD area. Mr. Farr showed the inspectors two PVD machines and how parts are chrome coated. The inspection group then returned to the Mr. Farr's office to review records.

Records Review

Mr. Farr provided the inspectors with waste profiles from Veolia and three years of hazardous waste manifests, used oil bills of lading and universal waste bills of lading. In addition, Mr. Farr provided the inspectors with a December 2011 version of the Federal Mogul Contingency Plan. Mr. Farr provided training records for Mr. Bill Sabin, Mr. Denis Carbon, and Mr. Rick LaPean. Mr. Farr also provided the inspectors with an MSDS sheet on the Isopar C solvent used at Plant 2.

Closing Conference

The inspectors conducted a closing conference. Inspector Francis explained that he would review his notes from the inspection, and generate an inspection report. Federal Mogul would then receive a letter from U.S. EPA regarding the inspection including a copy of the inspection report, completed inspection checklists and a copy of the photographs taken during the inspection. Inspector Francis discussed the labeling of used oil containers, contingency plan requirements, and the distillation apparatus and piping in Plant 2. Inspector Francis provided a U.S. EPA Small Business Resources information sheet, a U.S. EPA Region 5 Pollution Prevention contact sheet, a U.S. EPA Managing Used Oil Advice for Small Businesses fact sheet, and a University of Wisconsin Extension Solid and Hazardous Waste Education Center Environmental Programs brochure to Mr. Farr.

Attachments

Inspection Checklists.

Photographs.



LARGE QUANTITY GENERATOR INSPECTION

Revision: 03/19/2012
WASTE & MATERIALS
MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of facilities that generate over 1000 kg (2205 lbs) of non acute hazardous waste in a calendar month or over 1 kg of acute hazardous waste in a calendar month, evaluates compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

Section 1: Waste Information

A. Hazardous waste determination has been made on each solid waste generated. <i>2007 rec'd 2/20/13 HAWG WASTE</i>	Y	662.011 Photo <input type="checkbox"/>
B. Waste determination was made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used. <i>612407/ERL</i>	Y	662.011(3) Photo <input type="checkbox"/>
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers. <i>WADSW -</i>	Y	662.011(3)(a)1 Photo <input type="checkbox"/>
D. Generator keeps records of all waste determinations on-site for at least three years from the date the waste was last sent to a storage, treatment or disposal facility.	Y	662.040(3) Photo <input type="checkbox"/>
E. Generator submitted a notification form and obtained an EPA ID#. Note: A subsequent notification should be submitted when there is an ownership or name change.	Y	662.012 Photo <input type="checkbox"/>

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

A. Generator initiated a manifest with all off-site shipments of hazardous waste.	Y	662.020(1) Photo <input type="checkbox"/>
B. The manifest is used according to the instructions in the appendix to 40 CFR part 262.	Y	662.020(1) Photo <input type="checkbox"/>
C. The facility designated on the manifest is permitted or licensed to accept the waste.	Y	662.020(2) Photo <input type="checkbox"/>
D. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility.	Y	662.023(3) Photo <input type="checkbox"/>
E. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in the appendix of 40 CFR part 262.	Y	662.020(1) Photo <input type="checkbox"/>
F. If the generator received a shipment back as a rejected load, the returned waste was accumulated in compliance with the container or tank standards for less than 90 days.	N/A	662.034(13) Photo <input type="checkbox"/>
G. Upon receipt of the rejected shipment, the generator signed EITHER of the following: 1. Manifest Item 18c if the transporter returned the shipment using the original manifest. 2. Manifest Item 20 if the transporter returned the shipment using a new manifest.	N/A	662.034(13) Photo <input type="checkbox"/>
H. A copy of the manifest signed by the generator is retained until the signed copy from the designated facility is received.	Y	662.040(1) Photo <input type="checkbox"/>
I. Copy of each manifest is kept for at least three years from the date of shipment.	Y	662.040(1) Photo <input type="checkbox"/>
J. Hazardous waste is packaged according to applicable DOT requirements before transport.	Y	662.030 Photo <input type="checkbox"/>



LARGE QUANTITY GENERATOR INSPECTION

Revision: 03/19/2012
WASTE & MATERIALS
MANAGEMENT PROGRAM

Action 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

K. Hazardous waste is labeled according to applicable DOT requirements before transport.	Y	662.031 Photo <input type="checkbox"/>
L. Hazardous waste is marked according to applicable DOT requirements before transport.	Y	662.032(1) Photo <input type="checkbox"/>
M. Containers of 119 gallons and less are marked with the "Hazardous Waste-Federal law prohibit improper disposal" label before transport.	Y	662.032(2) Photo <input type="checkbox"/>
N. Placards are offered to the initial transporter.	Y	662.033 Photo <input type="checkbox"/>

Action 3: Land Disposal Restrictions

A. Generator determined if each waste is prohibited from land disposal by lab analysis or generator knowledge. <i>Every shipment</i>	Y	668.07(1) Photo <input type="checkbox"/>
B. Generator complies with the prohibition against dilution of wastes.	Y	668.03 Photo <input type="checkbox"/>
C. A one-time written notice was sent to each treatment, storage or disposal facility with the initial waste shipment.	Y	668.07(1) Photo <input type="checkbox"/>
D. A new notification is sent to the TSD and maintained in the generator file when the waste or receiving facility changes.	Y	668.07(1) Photo <input type="checkbox"/>
E. If the waste MEETS treatment standards, the LDR notice certifies wastes may be land disposed without further treatment.	N/A	668.07(1) Photo <input type="checkbox"/>
F. If the waste EXCEEDS treatment standards, the LDR notice gives notification of appropriate treatment and applicable prohibitions.	Y	668.07(1) Photo <input type="checkbox"/>
G. A copy of the LDR notifications and certifications are retained for at least 3 years from the date the waste was last sent off-site.	Y	668.07(1)(h) Photo <input type="checkbox"/>
H. Underlying hazardous constituents have been identified for characteristic wastes.	Y	668.09(1) Photo <input type="checkbox"/>
I. Generator identifies EITHER of the following when the waste is both a listed and characteristic waste: 1. The treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste codes. 2. The treatment standards for all applicable listed and characteristic waste codes.	Y	668.09(2) Photo <input type="checkbox"/>
J. If waste is treated in containers or tanks, the generator meets BOTH of the following (NR 668.07(1)(e): 1. Developed a written waste analysis plan describing the procedures used to meet applicable LDR treatment standards. 2. Complies with the certification requirements in NR 668.07(1)(c).	N/A	662.034(1)(d) Photo <input type="checkbox"/>

de/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected

oncode ? : Y: Yes N: No UN: Unknown

Notes : *: Dept. approved alternate may apply

No 'box' is an open ended question



LARGE QUANTITY GENERATOR INSPECTION

Revision: 03/19/2012
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 4: Annual Reports and Exception Reporting

A. Annual reports covering generator activities during the calendar year have been submitted to the Department by March 1 of the following year.	Y	662.041 Photo <input type="checkbox"/>
B. Transporter or TSD is contacted if signed manifest is not received in 35 days.	Y	662.042(1) Photo <input type="checkbox"/>
C. Exception report is submitted to the Department if a signed manifest is not received within 45 days.	Y	662.042(2) Photo <input type="checkbox"/>
D. Copy of each annual report and exception report is kept for at least 3 years from the date of the report.	Y	662.040(2) Photo <input type="checkbox"/>

Section 5: Preparedness and Prevention

A. Generator has ALL of the following, unless the equipment is not necessary for the types of wastes handled (NR 665.0032): 1. Device to summon emergency assistance (e.g., telephone, 2 way radio). 2. Internal communications and alarm systems. 3. Portable fire extinguishers. 4. Fire control equipment, including special extinguishing equipment. 5. Spill control equipment. - 250 mg / m ³ 6. Decontamination equipment (e.g., eyewash, shower). 7. Water at adequate volume and pressure to supply water spray systems.	Y	662.034(1)(d) Photo <input type="checkbox"/>
B. All of the above emergency equipment is tested and maintained to assure its proper operation in an emergency (NR 665.0033). once / month - once / yr -	Y	662.034(1)(d) Photo <input type="checkbox"/>
C. There is immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas (NR 665.0034).	Y	662.034(1)(d) Photo <input type="checkbox"/>
D. Generator has made ALL of the following arrangements with emergency organizations (NR 665.0037): 1. Primary and support roles have been defined if multiple police and fire departments could respond to an emergency. 2. Police, fire and emergency response teams are familiar with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes. 3. Agreements are made with emergency response contractors and equipment suppliers. - Holy Trinity - VEOBA 4. Local hospitals are familiar with the properties of wastes handled and the types of injuries or illnesses that could result from an emergency.	Y	662.034(1)(d) Photo <input type="checkbox"/>
E. Aisle space provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment (NR 665.0035).	Y	662.034(1)(d) Photo <input type="checkbox"/>

Section 6: Contingency Plan and Emergency Procedures

A. Generator has a written contingency plan, amended SPCC plan or other emergency plan that will be implemented immediately in the event of a fire, explosion or hazardous waste discharge (NR 665.0051). If there is no written plan go to question 7.A. see 2011 version	Y	662.034(1)(d) Photo <input type="checkbox"/>
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LARGE QUANTITY GENERATOR INSPECTION

Section 6: Contingency Plan and Emergency Procedures

B. Generator has amended a SPCC plan or other emergency plan so it sufficiently incorporates hazardous waste management provisions (NR 665.0052(2)).	Y	662.034(1)(d) Photo <input type="checkbox"/>
C. Copies of the contingency plan and all revisions have been made available to police, fire, hospital and emergency response teams. (NR 665.0052(3)).	Y	662.034(1)(d) Photo <input type="checkbox"/>
D. Contingency plan was amended due to ANY of the following (NR 665.0054): 1. Contingency plan failed in an emergency. 2. Change in site design, construction, O&M, or other circumstances which affect emergency response. 3. Emergency coordinators changed. 4. Emergency equipment changed.	Y	662.034(1)(d) Photo <input type="checkbox"/>
E. Contingency plan identifies an emergency coordinator who meets ALL of the following (NR 665.0055): 1. Available or on call to coordinate emergency response measures. 2. Familiar with all aspects of site activities and the contingency plan. 3. Has authority to commit the resources needed to carry out the contingency plan.	Y	662.034(1)(d) Photo <input type="checkbox"/>
F. Contingency plan includes ALL of the following (NR 665.0052): 1. Designation of the primary emergency coordinator, with alternates listed in the order of assuming responsibility. 2. Name, address and phone number, office and home, for each emergency coordinator. 3. Description of the arrangements agreed to by the police, fire, hospitals and emergency response teams to coordinate emergency services. 4. Evacuation plan for personnel including signal(s) to be used in the event of evacuation and alternate routes. 5. Actions facility personnel will take in response to a fire, explosion, or hazardous waste discharge. 6. List of emergency equipment at the site, including location, description and capabilities of each item.	NO	662.034(1)(d) Photo <input type="checkbox"/>
G. Contingency plan requires the emergency coordinator to do ALL of the following in the event of a fire, explosion, or discharge of hazardous wastes (NR 665.0056): 1. Activate internal alarms or communication systems. 2. Notify appropriate authorities, if their help is needed. 3. Identify the character, source, amount, and extent of discharged hazardous materials. 4. Assess hazards to human health and the environment. 5. If the incident threatens human health or the environment outside the facility, notify local authorities that evacuation may be necessary and notify the national response center (800-424-8802) and the division of emergency government (800-943-0003). 6. Take all reasonable measures necessary to ensure fires, explosions and discharges do not occur, reoccur, or spread. 7. Monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes, or other equipment if the site stops operation. 8. Provide for treating, storing, or disposing of recovered waste, contaminated soil, surface water, or other material. 9. Ensure wastes that are incompatible with the released material are not treated, stored or disposed until cleanup is completed. 10. Ensure that emergency equipment is clean and fit for use prior to resuming operations. 11. Notify the department and appropriate state and local authorities before resuming operations. 12. Submit an incident report to the department within 15 days.	Y	662.034(1)(d) Photo <input type="checkbox"/>



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Section 7: Personnel Training Requirements

A. Generator has a program of classroom instruction or on-the-job training for personnel in hazardous waste management (NR 665.0016(1)(a)). If there is no training program go to question 8.A.	Y	662.034(1)(d) Photo <input type="checkbox"/>
B. Program is directed by a person trained in hazardous waste management procedures (NR 665.0016(1)(b)).	Y	662.034(1)(d) Photo <input type="checkbox"/>
C. Program teaches facility personnel hazardous waste management procedures relevant to the positions in which they are employed (NR 665.0016(1)(b)).	Y	662.034(1)(d) Photo <input type="checkbox"/>
D. Training program ensures personnel are able to respond effectively to emergencies by familiarizing them with the following applicable items (NR 665.0016(1)(c)): 1. Contingency plan implementation. 2. Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment. 3. Key parameters for automatic waste feed cut-off systems. 4. Communications and alarm systems. 5. Response to fires or explosions. 6. Response to groundwater contamination incidents. 7. Shutdown of operations.	Y	662.034(1)(d) Photo <input type="checkbox"/>
E. New employees are trained within 6 months of their assignment (NR 665.0016(2)).	Y	662.034(1)(d) Photo <input type="checkbox"/>
F. Employees work in supervised positions until they have completed the training (NR 665.0016(2)).	Y	662.034(1)(d) Photo <input type="checkbox"/>
G. Personnel take part in an annual review of the training (NR 665.0016(3)).	Y	662.034(1)(d) Photo <input type="checkbox"/>
H. Generator keeps ALL of the following training documents (NR 665.0016(4)): 1. Job title and the employee name for each position related to hazardous waste management. 2. Job description for each of the above job titles. 3. Description of the amount and type of introductory and continuing training that will be given to each employee. 4. Records that required training has been given to each employee.	Y	662.034(1)(d) Photo <input type="checkbox"/>
I. Training records are maintained until closure for current personnel and at least 3 years from the date the employee last worked at the facility (NR 665.0016(5)).	Y	662.034(1)(d) Photo <input type="checkbox"/>

Section 8: 90-Day Container Accumulation

A. Waste is accumulated in containers. If NO, go to Section 9.	Y	Photo <input type="checkbox"/>
B. Accumulation start date is clearly marked and visible for inspection on each container.	Y	662.034(1)(b) Photo <input type="checkbox"/>
C. All containers are clearly marked with the words "Hazardous Waste".	Y	662.034(1)(c) Photo <input type="checkbox"/>

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected

Noncode ? : Y: Yes N: No UN: Unknown

Notes : *: Dept. approved alternate may apply No 'box' is an open ended question

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Section 8: 90-Day Container Accumulation

D. If container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	Y	662.034(1)(a)1 Photo <input type="checkbox"/>
E. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	Y	662.034(1)(a)1 Photo <input type="checkbox"/>
F. Containers are kept closed, except when it is necessary to add or remove waste (NR 665.0173(1)).	Y	662.034(1)(a)1 Photo <input type="checkbox"/>
G. Containers are opened, handled or stored to prevent leaks or ruptures (NR 665.0173(2)).	Y	662.034(1)(a)1 Photo <input type="checkbox"/>
H. Container storage areas are inspected weekly for leaks and deterioration (NR 665.0174).	Y	662.034(1)(a)1 Photo <input type="checkbox"/>
I. Containers of ignitable or reactive waste are located at least 50 feet from the property line (NR 665.0176).	Y	662.034(1)(a)1 Photo <input type="checkbox"/>
J. Containers of incompatible wastes are separated or protected from each other by a physical barrier (dike, berm, wall or other device) (NR 665.0177(3)).	Y	662.034(1)(a)1 Photo <input type="checkbox"/>
K. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).	Y	662.034(1)(a)1 Photo <input type="checkbox"/>
L. Containers that previously held waste are properly washed before adding incompatible waste, unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(2)).	N/A	662.034(1)(a)1 Photo <input type="checkbox"/>

Section 9: Subchapter BB Standards for Equipment Leaks

A. Generator operates any of the following equipment containing or contacting hazardous wastes with organic concentration $\geq 10\%$ by weight. If NO, go to Section 10 (NR 662.034(1)(a), NR 665.1050(2)). 1. Pumps in light liquid service. 2. Compressors. 3. Pressure relief devices in gas or vapor service. 4. Sampling connection systems. 5. Open-ended valves or lines. 6. Valves in gas or vapor service or in light liquid service. 7. Pumps or valves in heavy liquid service. 8. Pressure relief devices in light liquid or heavy liquid service. 9. Flanges or other connectors.	NO	 Photo <input type="checkbox"/>
B. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it is in vacuum service and individually listed in the facility operating record by an identification number (NR 665.1050(4), NR 665.1064(7)(e)).		662.034(1)(a) Photo <input type="checkbox"/>
C. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it operates < 300 hours per calendar year and is identified, either by list or location (area or group), in the facility operating record. (NR 665.1050(5), NR 665.1064(7)(f)).		662.034(1)(a) Photo <input type="checkbox"/>
D. If the facility determines compliance with subch. BB by documenting compliance with Clean Air Act requirements, the documentation is readily available as part of the operating record (NR 665.1064(13)).		662.034(1)(a) Photo <input type="checkbox"/>

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected

Unicode ? : Y: Yes N: No UN: Unknown

Notes : *: Dept. approved alternate may apply

No 'box' is an open ended question

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Section 9: Subchapter BB Standards for Equipment Leaks

E. ALL of the following information used to determine the applicability of exclusions in Questions 9.B. - 9.D. is maintained at the facility (NR 665.1064(11)):

1. Analysis determining the design capacity of the hazardous waste management unit.
2. Statement listing the hazardous waste influent to and effluent from each hazardous waste management unit subject to subch. BB and an analysis determining whether these hazardous wastes are heavy liquids.
3. Up-to-date analysis and the supporting information used to determine whether or not equipment is subject to subch. BB.

662.034(1)(a)

Photo ☐

F. When knowledge of the nature of the hazardous waste stream or the process by which it was produced is used to determine the applicability of the exclusions, supporting documentation such as the following are maintained at the facility (NR 665.1064(11)):

1. Information that the production process does not use organic compounds.
2. The process is identical to a process at another facility where the total organic content was measured at <10%.
3. The process has not changed to affect the total organic concentration of the waste.

662.034(1)(a)

Photo ☐

G. The facility keeps records of new determinations performed when there are any changes that could result in an increase in the total organic content of the waste in contact with equipment that is not subject to subch. BB requirements (NR 665.1064(11)).

662.034(1)(a)

Photo ☐

H. All equipment stated in Question 9.A. is excluded from additional subch. BB requirements. If NO, complete the subch. BB inspection form.

Photo ☐

Section 10: Subchapter CC Level 1 Container Standards

A. The facility manages hazardous waste in containers with EITHER of the following design capacities. If NO, go to Question 10.R. (NR 665.1087(2)(a), NR 662.034(1)(a)1).

1. Between 26 and 119 gallons.
2. Greater than 119 gallons and not in light material service.

NO

Photo ☐

B. Containers are exempt from CC regulation because of ALL of the following (NR 662.034(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)2., NR 665.1084(1)(b)):

1. The average VO concentration at the point of origination is <500 ppmw for all hazardous waste entering the container.
2. The initial determination of the average VO concentration for the waste stream was made before the material was placed in the container.
3. The initial determination is reviewed and updated at least once every 12 months.
4. A new waste determination is performed whenever changes to the source generating the waste stream likely causes the average VO concentration to increase to ≥ 500 ppmw.
5. The average VO concentration is determined by direct measurement or by knowledge.

Note: See NR 665.1084(1)(c) for direct measurement procedures and NR 665.1084(1)(d) for using knowledge.

Photo ☐

C. For each waste determination, the date, time, and location of each waste sample collected are maintained in the facility records (NR 665.1090(6)(a)).

662.034(1)(a)1

Photo ☐

D. Containers are excluded from subch. CC because they are used to store or treat hazardous waste from organic peroxide manufacturing processes (NR 662.034(1)(a)1, NR 665.1080(4)).

Photo ☐

Note: Certain records are to be maintained. Refer to 665.1090(9) for more information.

E. Containers are excluded from subch. CC because they are used solely to store or treat EITHER of the following (NR 662.034(1)(a)1, NR 665.1080(2), NR 665.1090(10)):

1. On-site remediation wastes generated through NR 700 or RCRA corrective action activities.
2. Radioactive mixed wastes in accordance with NRC requirements

Photo ☐



LARGE QUANTITY GENERATOR INSPECTION

Section 10: Subchapter CC Level 1 Container Standards

F. Containers are excluded from subch. CC because BOTH of the following are met (NR 665.1080(2), NR 665.1090.(10)):

1. They are equipped with air emission controls operated in accordance with the Clean Air Act requirements.
2. Facility records include certification of such by the owner or operator and the specific air program compliance requirements for the containers

Photo ☐

G. All containers are excluded from subch. CC Level 1 standards. If YES, go to Question 10.R.

Photo ☐

H. Any of the following controls are used on all Level 1 containers (NR 665.1087(3)(a)):

1. Container meets applicable US DOT packaging requirements.
2. A cover and closure devices form a continuous barrier over the container openings such that when they are secured, there are no visible holes, gaps or other open spaces into the container.
3. An organic-vapor suppressing barrier is placed on or over the hazardous waste in an open-top container so that the hazardous waste is not exposed to the atmosphere.

662.034(1)(a)1

Photo ☐

Note: Level 1 standards do not apply to satellite accumulation or RCRA empty containers.

I. If Level 1 containers do not meet applicable US DOT packaging requirements, they are equipped with covers and closure devices composed of suitable materials that minimize exposure of hazardous waste to the atmosphere and maintain integrity of the covers and closure devices (NR 665.1087(3)(b)).

662.034(1)(a)1

Photo ☐

J. If a Level 1 container is filled to the final level in one continuous operation, the closure device is promptly secured in the closed position when the filling operation is concluded (NR 665.1087(3)(c)1.a).

662.034(1)(a)1

Photo ☐

K. If a Level 1 container is batch filled, the closure device is promptly secured in a closed position when the container is filled to the intended final level OR the batch loading is completed and any of the following first occurs (NR 665.1087(3)(c)1.b):

1. No additional material will be added within 15 minutes.
2. The person performing the loading operation leaves the immediate vicinity of the container.
3. The process generating the waste shuts down.

662.034(1)(a)1

Photo ☐

L. If a Level 1 container is opened to remove hazardous waste, the closure device is secured in the closed position upon completion of a batch removal AND when either of the following first occurs (NR 665.1087(3)(c)2b):

1. No additional materials will be removed within 15 minutes.
2. The person removing the waste leaves the immediate vicinity of the container.

662.034(1)(a)1

Photo ☐

M. If access to the inside of a Level 1 container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity (NR 665.1087(3)(c)3).

662.034(1)(a)1

Photo ☐

N. If a Level 1 container is equipped with a pressure relief device that vents to the atmosphere, ALL of the following conditions are met (NR 665.1087(3)(c)4):

1. The device is designed to operate with no detectable organic emissions (< 500 ppmv) when in the closed position.
2. The device is closed when the internal pressure is within the specified operating range.
3. The device opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.

662.034(1)(a)1

Photo ☐

O. Safety valves are only opened to avoid an unsafe condition (NR 665.1087(3)(c)5).

662.034(1)(a)1

Photo ☐

P. When a defect is detected, initial repair efforts are made within 24 hours of detection and completed within 5 calendar days (NR 665.1087(3)(d)3).

662.034(1)(a)1

Photo ☐



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Section 10: Subchapter CC Level 1 Container Standards

Q. If repairs cannot be completed in 5 days of detecting the defect, the waste is removed from the container which is not used until it is repaired (NR 665.1087(3)(d)3).

662.034(1)(a)1

Photo ☐

Section 11: Subchapter CC Level 2 Container Standards

A. The facility manages hazardous waste containers with a design capacity >119 gallons that are in light material service. If NO, go to Section 12.

Photo ☐

B. Any of the following controls are used on Level 2 containers: (NR 665.1087(4)(a))

662.034(1)(a)2

1. Container meets applicable US DOT packaging requirements.
2. Each potential leak interface where organic vapor leakage could occur on the container, cover and closure device has been checked to determine that no detectable organic emissions (< 500 ppmv) are occurring.
3. The facility has demonstrated within the last 12 months that the containers are vapor-tight using Method 27 in appendix A of 40 CFR part 60.

Photo ☐

C. If the potential leak interface on the containers were checked, BOTH of the following were met: (NR 665.1087(4)(a))

662.034(1)(a)2

1. Checks were made on the interface of the cover rim and the container wall; the periphery of any opening on the container or container cover and its associated closure device; and, the sealing seat interface on a spring-loaded, pressure-relief valve.
2. The test was performed when the container was filled with a material having a VO concentration representative of the hazardous waste expected to be stored in the container.

Photo ☐

D. The facility maintains a copy of the procedure used to determine that containers >119 gallons in size that do not meet DOT requirements are not managing hazardous waste in light material service. (NR 665.1087(3)(e))

662.034(1)(a)2

Photo ☐

E. Level 2 controls are used when transferring waste in or out of the container that minimize exposure to the atmosphere (submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(4)(b))

662.034(1)(a)2

Photo ☐

F. If the container is filled to the final level in one continuous operation, the closure devices are promptly secured in the closed position when the filling operation is concluded. (NR 665.1087(4)(c)1.a.)

662.034(1)(a)2

Photo ☐

G. If the container is batch filled, the closure devices are promptly secured in a closed position upon filling the container to the intended final level, or when the batch loading is completed and ANY of the following first occurs: (NR 665.1087(4)(c)1.b.)

662.034(1)(a)2

Photo ☐

1. No additional material will be added within 15 minutes.
2. The person performing the loading operation leaves the immediate vicinity of the container.
3. The process generating the waste shuts down.

H. If containers are opened to remove hazardous waste, closure devices are secured in the closed position upon completion of a batch removal and either of the following first occurs: (NR 665.1087(4)(c)2.b.)

662.034(1)(a)2

Photo ☐

1. No additional materials will be removed within 15 minutes.
2. The person removing the waste leaves the immediate vicinity of the container.

I. If access to the inside of the container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity. (NR 665.1087(4)(c)3.)

662.034(1)(a)2

Photo ☐



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Section 11: Subchapter CC Level 2 Container Standards

J. If the container is equipped with a pressure relief device that vents to the atmosphere, the device meets ALL of the following conditions: (NR 665.1087(4)(c)4.)

1. Designed to operate with no detectable organic emissions when in the closed position.
2. Closed when the internal pressure is within the specified operating range.
3. Opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.

K. Safety valves are only opened to avoid an unsafe condition. (NR 665.1087(4)(c)5.)

L. When a defect is detected, initial repair efforts are made within 24 hours of detection. (NR 665.1087(4)(d)3.)

M. Repairs are completed within 5 days, or the waste is removed from the container which is not used until the defect is repaired. (NR 665.1087(4)(d)3.)

662.034(1)(a)2

Photo ☐

662.034(1)(a)2

Photo ☐

662.034(1)(a)2

Photo ☐

662.034(1)(a)2

Photo ☐

Section 12: Subchapter CC Level 3 Container Standards

A. The facility manages hazardous waste in containers having a design capacity >26 gallons during a waste stabilization process when hazardous waste is exposed to the atmosphere. If NO, go to Section 13.

B. The container is vented directly through a closed-vent system to a control device, or the container is vented inside an enclosure which is exhausted through a closed-vent system to a control device. (NR 665.1087(5)(a))

C. If the container is vented inside an enclosure, the enclosure is operated according to the criteria for permanent total enclosures found in Method 204 in appendix M of 40 CFR part 51. (NR 665.1087(5)(b)1.)

D. Records for the most recent set of calculations and measurements verifying the enclosure meets the criteria for a permanent total enclosure in Method 204 in appendix M of 40 CFR part 51 are maintained at the facility. (NR 665.1090(4)(a))

E. Level 3 controls are used when wastes are transferred in or out of the container that minimize exposure to the atmosphere (e.g., submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(5)(f))

Photo ☐

662.034(1)(a)2

Photo ☐

662.034(1)(a)2

Photo ☐

662.034(1)(a)2

Photo ☐

662.034(1)(a)2

Photo ☐

Section 13: Satellite Accumulation

A. Waste is accumulated in satellite accumulation areas. If NO, go to Section 14.

B. Generator accumulates no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area.

C. Satellite containers are under the control of the operator of the process generating the waste.

D. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).

Y

Photo ☐

Y

662.034(3)(a)

Photo ☐

N

662.034(3)(a)

Photo ☐

Y

662.034(3)(a)1

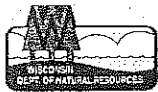
Photo ☐

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected

Iconcode ? : Y: Yes N: No UN: Unknown

Notes : *: Dept. approved alternate may apply

No 'box' is an open ended question



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Section 13: Satellite Accumulation

E. If a container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	Y	662.034(3)(a)1 Photo <input type="checkbox"/>
F. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	Y	662.034(3)(a)1 Photo <input type="checkbox"/>
G. Containers are marked "Hazardous Waste" or with other words that identify the contents.	Y	662.034(3)(a)2 Photo <input type="checkbox"/>
H. Container holding the excess waste is marked with the date the excess amount begins accumulating.	Y	662.034(3)(b) Photo <input type="checkbox"/>
I. Generator complies with the 90 day accumulation requirements with respect to the excess amount within 3 days of it being generated.	Y	662.034(3)(b) Photo <input type="checkbox"/>

Section 14: Waste Minimization

A. Generator includes waste minimization information in the annual report. <i>Better phrasing - scrap reduced</i>	Y	662.041(3)(e) Photo <input type="checkbox"/>
B. Generator has a program in place to reduce the volume or quantity and toxicity of waste to an economically practicable degree. Note: The inspector should look for evidence justifying the generator's waste minimization certification on the manifest. Also, EPA guidance recommends that the generator have a written waste minimization/pollution prevention plan.	Y	662.027(1) Photo <input type="checkbox"/>

Section 15: Used Oil

A. Used oil is managed on-site. If NO, go to Section 16	Y	Photo <input type="checkbox"/>
B. Used oil containing $\geq 1,000$ ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.	N/A	679.10(2)(a)2 Photo <input type="checkbox"/>
C. Used oil containers and tanks are in good condition and not leaking.	Y	679.22(2) Photo <input type="checkbox"/>
D. Used oil containers and tanks are marked "used oil". <i>used oil</i>	N	679.22(3)(a) Photo <input type="checkbox"/>
E. Transporter has an EPA ID number, except when generator self-transport or has a tolling agreement. <i>Safety - (Hem - Hoffman, Kimberly, NE) WFO 988 579 479</i>	Y	679.24 Photo <input type="checkbox"/>
F. Used automotive oil filters and oil absorbent material are not land filled, except if less than 1 gallon absorbent results from a non-routine spill. <i>no oil</i>	Y	Photo <input type="checkbox"/>



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Section 15: Used Oil

G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met:
1. Only used oil from the generator or household do-it-yourselfers is burned.
2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less.
3. The combustion gases are vented to the ambient air.

N/A

679.23

Photo ☐

H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.

N/A

679.11

Photo ☐

Section 16: F006 Wastewater Treatment Sludge

A. Generator accumulates F006 sludge for more than 90 days. If NO, go to Section 17.

N/A

Photo ☐

B. The F006 waste is accumulated for no more than 180 days, unless the waste is shipped 200 miles or more.

N/A

662.034(7)

Photo ☐

C. Pollution prevention practices are in place to reduce the amount of contaminants entering the F006 waste.

N/A

662.034(7)(a)

Photo ☐

D. The F006 waste is legitimately recycled through metals recovery.

N/A

662.034(7)(b)

Photo ☐

E. No more than 20,000 kg (44,100 lbs) of F006 waste is accumulated on-site.

N/A

662.034(7)(c)

Photo ☐

F. Accumulation containers meet subch. I, AA, BB and CC standards in ch. NR 665.

N/A

662.034(7)(d)1.a

Photo ☐

G. The accumulation start date is clearly marked and visible for inspection on each container.

N/A

662.034(7)(d)3

Photo ☐

H. Accumulation tanks meet subch. J, AA, BB and CC standards in ch. NR 665, except for NR 665.0197(3) and NR 665.0200.

N/A

662.034(7)(d)1.b

Photo ☐

I. Each container and tank of F006 waste is clearly marked with the words "Hazardous Waste".

N/A

662.034(7)(d)4

Photo ☐

J. A containment building used for accumulation meets subch. DD standards in ch. NR 665; a P.E. certification stating compliance with the design standards is in the operating record AND written procedures and documentation for emptying the unit within 180 days are on file.

N/A

662.034(7)(d)1.c

Photo ☐

K. The accumulation of F006 waste is included in the preparedness and prevention procedures, contingency plan and personnel training program.

N/A

662.034(7)(d)5

Photo ☐

L. If waste is accumulated for up to 270 days, the generator must ship the waste over 200 miles for metals recovery.

N/A

662.034(8)

Photo ☐



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Section 17: Generator Status Evaluation

A. Waste is accumulated for less than 90 days, except as allowed in Sections 13 and 16.

Y

662.034(1)

Photo ☐

B. More than 2,205 lbs. of non-acute hazardous waste; 2.2 lbs. of acute hazardous waste; or, 220 lbs. of residue from cleanup of an acute hazardous waste spill is generated in any month (NR 662.190(1), NR 662.220(4)).

Y

Photo ☐

C. Describe other activities that the generator conducts at the facility (accumulation in tanks, recycling, 10-day transfer, transporter, used oil, treatment, storage, disposal, universal waste, etc.).
used oil, universal waste

Photo ☐

D. If waste was previously accumulated in a tank system, the generator performed EITHER of the following (NR 665.0197(1), NR 665.0197(2)):

N/A

662.034(1)(a)2

Photo ☐

1. Closure by removing or decontaminating waste residues, contaminated containment system components, soils, structures and equipment.
2. Initiated long-term care if all contaminated soils cannot be practicably removed or decontaminated.



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UNIVERSAL WASTE HANDLER INSPECTION REPORT - SMALL QUANTITY HANDLER

This Inspection Form, used for the inspection of facilities that generate or handle less than 5000 kg of universal waste (hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices), evaluates facility compliance with Wisconsin's Hazardous Waste Management Rules (chapters NR 660-679, Wis. Admin. Code). The Universal waste regulations streamline the requirements for hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices. Persons treating, disposing, recycling, or otherwise processing universal wastes are subject to applicable hazardous waste regulations.

Section 1: Prohibitions

A. Universal waste is not disposed on-site.	Y	673.11(1) Photo <input type="checkbox"/>
B. Universal waste is not diluted or treated on-site. Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste.	Y	673.11(2) Photo <input type="checkbox"/>

Section 2: General Standards

A. Universal waste batteries and thermostats that are broken or show evidence of leakage or spillage are placed in closed, structurally sound containers that are compatible with the waste and are not leaking.	Y	673.13 Photo <input type="checkbox"/>
B. Universal waste pesticides and lamps are placed in closed, structurally sound containers that are compatible with the waste and not leaking.	Y	673.13 Photo <input type="checkbox"/>
C. Sorting, mixing or handling of batteries is only conducted if the battery casing is not breached and remains intact.	Y	673.13(1)(b) Photo <input type="checkbox"/>
D. Wastes generated by handling or cleaning up spills of universal wastes are managed according to hazardous waste or solid waste rules.	Y	673.13 Photo <input type="checkbox"/>
E. If mercury containing ampules are removed from thermostats, the handler meets ALL of the following: 1. Ampules are removed in a manner to prevent breakage. 2. Removal is conducted over a containment device. 3. Spills or leaks are immediately cleaned up. 4. Activity is performed in a well ventilated, monitored environment.	N/A	673.13(3)(b) Photo <input type="checkbox"/>
F. Pesticides are placed in a tank that meets NR 665 subch. J requirements, except closure and post closure requirements in NR 665.0197(3) and waste analysis requirements in NR 665.0200.	N/A	673.13(2) Photo <input type="checkbox"/>
G. Pesticides are placed in a transport vehicle or vessel that is closed, structurally sound, not leaking and compatible with the waste.	N/A	673.13(2) Photo <input type="checkbox"/>
H. All universal wastes are labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste".	Y	673.14 Photo <input type="checkbox"/>
I. Containers, tanks, or transport vehicles of recalled pesticides are additionally marked with the label that was on or accompanied the product when it was sold or distributed.	N/A	673.14 Photo <input type="checkbox"/>
J. Length of accumulation time is demonstrated by any of the following: 1. Mark or label each container with the earliest date the waste is generated or received. 2. Mark or label the individual item of waste with the date it was generated or received. 3. Maintain an inventory system identifying the date the waste was generated or received. 4. Place the universal waste in a specific accumulation area identified with the earliest date the waste was generated or received. 5. Use some other method that clearly demonstrates the length of accumulation time.	Y	673.15(3) Photo <input type="checkbox"/>
K. Universal waste is accumulated for less than one year from the date generated or received from another handler. <i>last shipment 11/26/13</i> <i>Sperry, Hines, Red Arrow, etc</i>	Y	673.15(1) Photo <input type="checkbox"/>



UNIVERSAL WASTE HANDLER INSPECTION REPORT - SMALL QUANTITY HANDLER

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Section 2: General Standards

L. If universal waste is accumulated beyond one year, the handler can prove that accumulation was necessary to facilitate proper recovery, treatment or disposal.

N/A

673.15(2)

Photo ☐

M. Employees are trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility. *BILL SAGEW, Dennis Carlson*

Y

673.16

Photo ☐

N. Handler complies with ALL of the following when a release occurs:

1. Immediately contains the release.
2. Determines if the spill residue is hazardous waste.
3. If hazardous waste, disposes of it as such.

Y

673.17

Photo ☐

Section 3: Off-site Shipments

A. Handler sends the waste to a destination facility, foreign destination or another handler.

Y

673.18(1)

Photo ☐

B. Handler that self-transportes complies with ALL of the following:

1. Applicable US DOT regulations in 49 CFR parts 171 to 180 when transporting universal waste that meets the definition of hazardous materials.
2. Immediately contain release and make waste determination on spill residue.
3. If shipped to a foreign destination other than an OECD country, use an EPA acknowledgement of consent.

N/A

673.18(2)

Photo ☐

C. For hazardous materials, the handler packages, labels, marks, placards and prepares the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180.

Y

673.18(3)

Photo ☐

D. When shipping to another universal waste handler, the handler has agreed to receive the shipment.

Y

673.18(4)

Photo ☐

E. If a shipment was rejected, EITHER of the following occurred:

1. The waste was sent back to the originating handler.
2. The originating handler agreed on a destination facility to which to ship the waste.

N/A

673.18

Photo ☐

F. If a shipment contains hazardous waste, the handler receiving the shipment immediately notifies the Department.

N/A

673.18(7)

Photo ☐

G. Nonhazardous, nonuniversal waste, in a universal waste shipment is managed in compliance with the solid waste requirements.

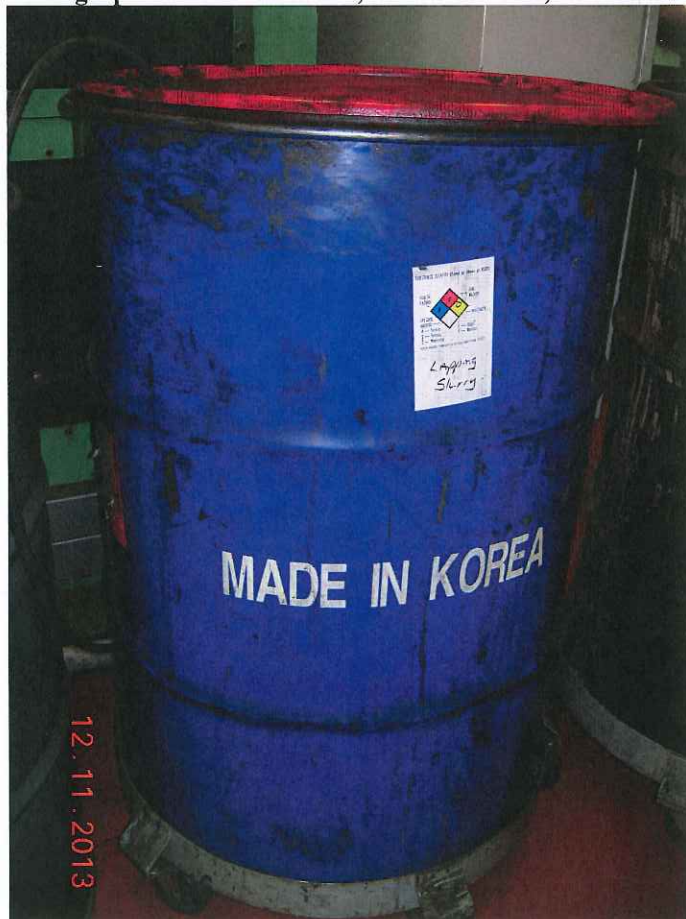
N/A

673.18(8)

Photo ☐



Photograph #1 – UPR Plant #2, Ferroxide Area, 55-Gallon SAA Blackening Sludge Container



Photograph #2 – UPR Plant #2, 55-Gallon Lapping Slurry Container



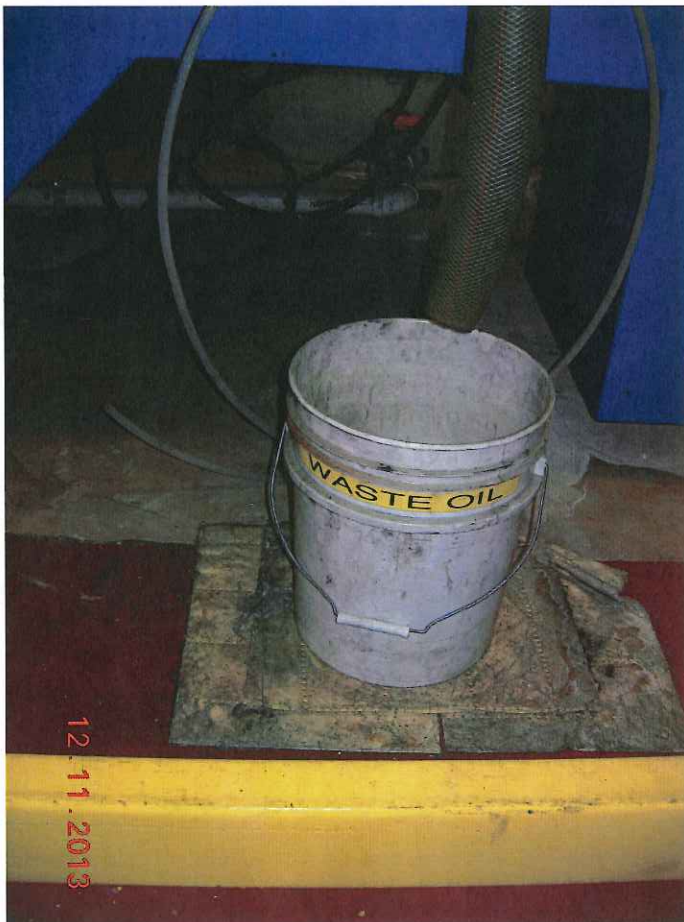
Photograph #3 – UPR Plant #2, 5-Gallon Container of Used Oil from Distillation Apparatus



Photograph #4 – UPR Plant #2, 55-Gallon Containers of Lapping Slurry



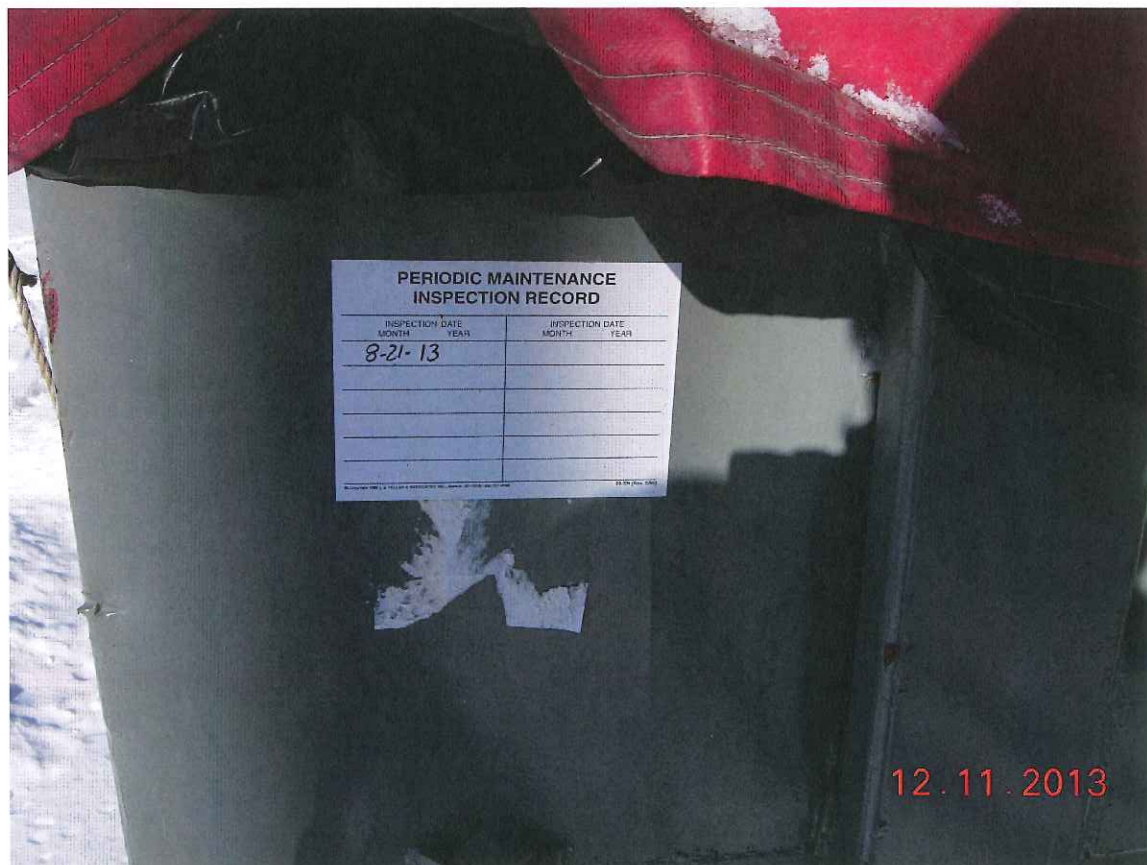
Photograph #5 – UPR Plant #2, 55-Gallon Containers of Blast Media and Lapping Slurry



Photograph #6 – UPR Plant #2, Wastewater Treatment Plant, 5-Gallon Used Oil Container



Photograph #7 - Outside of Federal Mogul Plant, Roll-Off Box of D007 Filters and PPE



Photograph #8 - Outside of Federal Mogul Plant, Roll-Off Box of D007 Filters and PPE



Photograph #9 – Outside of Federal Mogul Plant, Empty Roll-Off Box



Photograph #10 – Outside of Federal Mogul Plant, Roll-Off Box of F006 Filter Cake



Photograph #11 – Outside of Federal Mogul Plant, Roll-Off Box of F006 Filter Cake



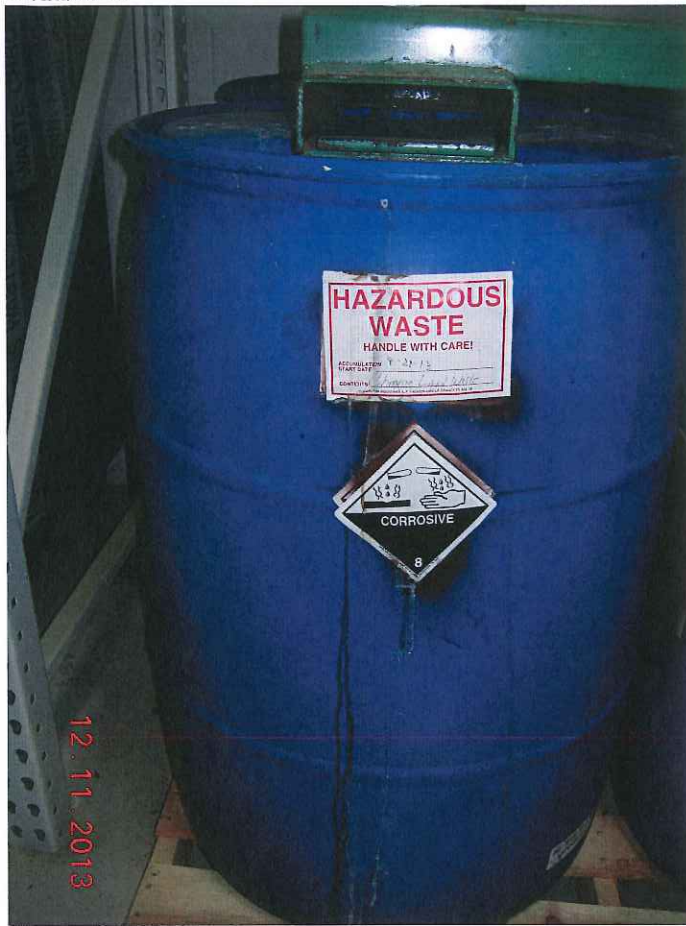
Photograph #12 – Outside of Federal Mogul Plant, Roll-Off Box of D007 Filters and PPE



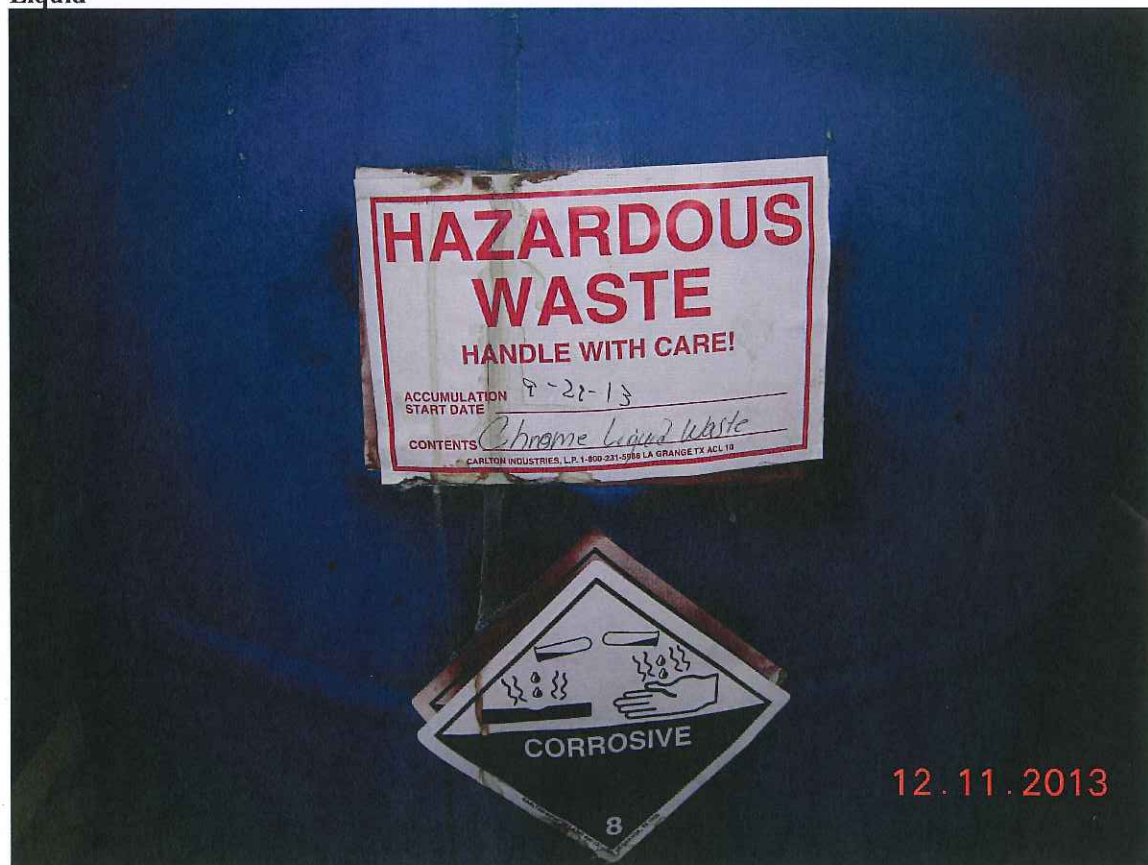
Photograph #13 – Hazardous Waste Accumulation Room #1 – 55-Gallon Container of Ultrasonic Degreaser



Photograph #14 – Hazardous Waste Accumulation Room #1



Photograph #15 – Hazardous Waste Accumulation Room #3, 55-Gallon Container of Waste Chrome Liquid



Photograph #16 – Hazardous Waste Accumulation Room #3, 55-Gallon Container of Waste Chrome Liquid



Photograph #17 – West Ground Level Access Area, Two 275-Gallon Totes of Used Oil



Photograph #18 – CR1 Plating Shop, F006 Wastewater Treatment Sludge Accumulation Container



Photograph #19 – Plating Shop, SAA “Accumulation Area” Containers of Chromium Sander Sludge, Chrome Solids, Chrome Debris, and Chrome Liquids



Photograph #20 – CR4 Plating Shop, F006 Wastewater Treatment Sludge Accumulation Container

